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ALEXANDER L. STEVAS,
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No. .....

In the Supreme Court of the United States

OCTOBER TERM, 1983

UNITED STATES OF AMERICA,
Respondent,

v.

HARRY S. STONEHILL,
ROBERT P. BROOKS
LOURDES BLANCO STONEHILL,
PACITA C. BROOKS, et al
Petitioners.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

Supplemental Appendix To
PETITION FOR WRIT OF CERTIORARI
By LOURDES BLANCO STONEHILL and
PACITA C. BROOKS
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

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APPENDIX D

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT
OF CALIFORNIA

UNITED STATES OF AMERICA, *Plaintiff*,	Date Entry: October 14, 1980
v.	
HARRY S. STONEHILL, et al., *Defendants.*	Civil No. 65-127 GJS
PACITA CARRION BROOKS, *Intervenor.*	JUDGMENT

IT IS ORDERED that:

1. The plaintiff United States of America recover $8,984,668.48 from Harry S. Stonehill for income taxes, penalties and interest to January 31, 1980 for the years 1958, 1959, 1960 and 1961, with interest accruing on the sum of $4,926,925 after January 31, 1980 at the rate of 12 percent per annum as provided by Section 6621(a) of the Internal Revenue Code up to the date of this Judgment, plus interest thereafter according to law.

2. The plaintiff United States of America recover $8,667,658.29 from Robert P. Brooks for income taxes, penalties and interest to January 31, 1980 for the years 1958, 1959, 1960 and 1961 with interest accruing on the sum of $4,743,789 after January 31, 1980 at the rate of 12 percent per annum as provided by Section 6621(a) of the Internal Revenue Code up

to the date of this Judgment, plus interest thereafter according to law.

3. The action of intervention filed by Pacita Carrion Brooks is dismissed with prejudice.

4. Plaintiff United States of America has a valid and perfected lien against the following property and subject to Paragraph 5 of this Judgment plaintiff's lien is foreclosed against the following property:

The following items (a) through (f) held by National Savings & Trust Company, Washington, D.C. Signatories: Trammell, Rand, Nathan & Lincoln, PC, at Trustees, and Joseph G. McGowan, Director of International Operations, Internal Revenue Service.

(a) *Certificate of Deposit No.* 05-60-09331 in the amount of $271,378.47, Maturity Date: October 22, 1980, Representing proceeds from the sale of Haromu Properties;

(b) *Certificate of Deposit No.* 05-60-09405 in the amount of $46,198.66, Maturity Date: November 25, 1980, Representing monies due to Greentree Investment Corporation (Holexa S. A. claiming as successor in interest) resulting from the sale of 8455 Beverly Boulevard;

(c) *Certificate of Deposit No.* 05-60-09588 in the amount of $50,104.96, Maturity Date: February 13, 1981, Representing monies owned by Joe Steinberg resulting from the sale of 8455 Beverly Boulevard;

(d) *Certificate of Deposit No.* 05-60-09471 in the amount of $107,222.76, Maturity Date: Novem-

ber 28, 1980, Representing proceeds from the sale of Tierra Ranch, Inc.;

(e) *Checking Account No.* 057-1196443 in the current amount of $46.77, used for stipulated disbursements;

(f) *Checking Account No.* 057-1196377 in the current amount of $46.77, used for stipulated disbursements.

The following items (g) and (h) are held by Coast and Southern Federal Savings and Loan Association, Los Angeles, California:

(g) *Account No.* 9-704459-8 in the amount of $5,554.61, Representing proceeds from the sale of Harjo Apartments. Signatories: The Steinbergs and Joseph G. McGowan, Director of International Operations, Internal Revenue Service;

(h) *Account No.* 9-71778-6 in the amount of $76,739.58, Representing proceeds from the sale of the film "To Be A Man." Signatories: Petramonte Productions and Joseph G. McGowan, Director of International Operations, Internal Revenue Service.

(i) *United California Bank* account in the amount of $1,253.11 in the name of Haromu Properties;

(j) *Home Savings and Loan (Beverly Hills, California) Account No.* 04-194204-6 in the amount of $396.28, in the name of Haromu Partnership.

(k) *Home Savings and Loan (Beverly Hills, California) Account No.* 04-179877-8 in the amount of $44,492.99, Maturity Date: December 8, 1980, in the name of Haromu Partnership.

Subject to Paragraph 5 of this Judgment, said

property is to be redeemed or converted to cash and delivered to the Clerk of the Court to be applied in satisfaction of plaintiff's Judgment.

5. Execution, or any foreclosure of lien or other action in aid thereof, under this Judgment is hereby stayed until this decision and Judgment has been affirmed by the highest court having jurisdiction of the parties and the subject matter or, in the event that no appeal has been taken or no petition for certiorari has been filed, as the case may be, after the time for taking such appeal or for filing such petition for certiorari has expired.

6. Pursuant to the Stipulation and Order of this Court dated April 9, 1965, this Judgment shall be entered as the Judgment of the United States District Court for the Northern District of California in Civil Action No. 43244 and of the United States District Court for the District of Hawaii in Civil Action No. 2348 after this decision and judgment has been affirmed by the highest court having jurisdiction of the parties and the subject matter or, in the event that no appeal has been taken or no pettiion for certiorari has been filed, as the case may be, after the timefor taking such appeal or for filing such petition for certiorari has expired.

7. All other parties to this action recover nothing and their claims are dismissed with prejudice.

DATED this 10th day of October, 1980.

Gus J. Solomon
United States District Judge

APPENDIX E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF CALIFORNIA

UNITED STATES OF AMERICA, *Plaintiff*,	Date Entry: October 14, 1980
v.	
HARRY S. STONEHILL, et al., *Defendants*.	Civil No. 43244 JUDGMENT
TRAMMEL, RAND, NATHAN & LINCOLN, a Partnership, *Intervenor*.	

IT IS ORDERED that:

1. Pursuant to the Stipulation and Order of this Court dated May 6, 1965, the decision and judgment of the Court of the United States District Court for the Central District of California in Civil Action No. 65-127-GJS dated October 10, 1980, will be entered as the judgment of this Court after said decision and judgment has been affirmed by the highest court having jurisdiction of the parties and the subject matter or, in the event that no appeal has been taken or no petition for certiorari has been filed, as the case may be, after the time for taking such appeal or for filing such petition for ctertirari has expired.

2. Plaintiff has a valid and perfected lien against the following property and, subject to Paragraph 3 of this Judgment, plaintiff's lien is foreclosed against the following property:

(a) *Certificate of Deposit No.* 05-60-09553 in the amount of $104,265.73, Maturity Date: November 3, 1980, Representing monies transferred by the Lourdes Blanco Stonehill Children's Trust in settlement of all claims against the trust and Brookwood-Orinda Associates. Held by: National Savings and Trust Company, Washington, D. C. Signatories: Trammell, Rand, Nathan & Lincoln, PC, as Trustees, and Joseph G. McGowan, Director of International Operations, Internal Revenue Service;

(b) *Pine Street Management Corporation Stock*, 250 shares, San Francisco, California in the following names:

Harry F. Stonehill	75 Shares
Lourdes B. Stonehill	50 Shares
Robert P. Brooks	75 Shares
Pacita C. Brooks	50 Shares

Subject to Paragraph 3 of this Judgment, said property is to be redeemed or converted to cash and delivered to the Clerk of the Court or sold by the United States Marshall in the manner provided by law, to be applied in satisfaction of plaintiff's Judgment after payment of the costs and disbursement of sale.

3. Execution or any foreclosure of liens or other action in aid thereof under this Judgment is hereby stayed until said decision and Judgment of the United States District Court for the Central District of California in Civil Action 65-127-GJS dated October 10, 1980 has been affirmed by the highest court having jurisdiction of the parties and the subject matter or,

in the event that no appeal has been taken or no petion for certiorari has been filed, as the case may be, after the time for taking such appeal or for filing such petition for certiorari has expired. Thereafter, plaintiff may foreclose against any assets belonging to defendants Harry S. Stonehill and Robert P. Brooks within the jurisdiction of this Court to the extent that assets under the jurisdiction of the Central District of California shall be insufficient to satisfy such judgment.

4. The action in intervention filed by Trammell, Rand, Nathan & Lincoln, a Partnership, is dismissed with prejudice.

5. Plaintiff's claims against Harry S. Stonehill as trustee of the Lourdes Blanco Stonehill Children's Trust, and the Elizabeth Ann Stonehill Trust, and the Susan Jane Stonehill Trust and the Harry Steven Stonehill, Jr. Trust and the Michael Joseph Stonehill Trust, Elizabeth Ann Stonehill, Susan Jane Stonehill, Harry Steven Stonehill, Jr., Michael Joseph Stonehill and Peter O. Mattei are hereby dismissed with prejudice.

6. All other parties to this action recover nothing and their claims are dismissed with prejudice.

DATED this 10th day of October, 1980.

Gus J. Solomon
United States District Judge

APPENDIX F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, *Plaintiff*,) Date Entry:
) October 14, 1980
v.)
) Civil No. 2348
HARRY S. STONEHILL, et al., *Defendants.*) JUDGMENT

IT IS ORDERED that:

1. Pursuant to the Stipulation and Order of this Court dated August 14, 1970, the decision and judgment of the United States District Court for the Central District of California in Civil Action No. 65-127-GJS dated October 10, 1980 will be entered as the Judgment of this Court after said decision and judgment has been affirmed by the highest court having jurisdiction of the parties and the subject matter or, in the event that no appeal has been taken or no petition for certiorari has been filed, as the case may be, after the time for taking such appeal or for filing such petition for certiorari has expired.

2. Plaintiff has a valid and perfected lien against the following property and subject to Paragraph 3 of this Judgment plaintiff's lien is foreclosed against the following property:

(a) *Tower Development Corporation Stock*, 4,900 Shares, Honolulu, Hawaii, in the following names:

Harry S. Stonehill 950 Shares
Robert P. Brooks 3,950 Shares

(b) Liabilities reflected in the financial statement of Tower Development Corporation as of January 31, 1979, totalling: $491,643, plus accrued interest of $473,207. Representing loans payable to Baer Bank, Holexa, S.A., claiming such obligations as successor in interest.

Subject to Paragraph 3 of this Judgment, said property is to be redeemed or converted to cash and delivered to the Clerk of the Court or sold by the United States Marshall in the manner provided by law, to be applied in satisfaction of plaintiff's judgment after payment of the costs and disbursements of sale.

3. Execution or any foreclosure of lien or other action in aid thereof under this Judgment is hereby stayed until said decision and Judgment of the United States District Court for the Central District of California in Civil Action No. 65-127-GJS dated October 10, 1980 has been affirmed by the highest court having jurisdiction of the parties and the subject matter or, in the event that no appeal has been taken or no petition for certiorari has been filed, as the case may be, after the time for taking such appeal or for filing such petition for certiorari has expired. Thereafter, and after final appellate determination of the claim of the Lourdes Blanco Stonehill Children's Trust (more correctly known as the Stonehill Family Trust) relating to the ownership of shares of stock of

Tower Development Corporation and the issue of whether plaintiff is entitled to the liquidation of Tower Development Corporation (involving the claims of defendants Ben Gromet, Tower Development Corporation and William Saunders), plaintiff may foreclose against any assets belonging to defendants Harry S. Stonehill and Robert P. Brooks within the jurisdiction of this Court to the extent that assets under the jurisdiction of the Central District of California shall be insufficient to satisfy said Judgment.

4. All other parties to this action recover nothing and their claims are dismissed with prejudice.

DATED this 10th day of October, 1980.

Gus J. Solomon
United States District Judge